

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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|-----------------------------|---|--------------------------------|
| JOHN HANCOCK LIFE INSURANCE |) | |
| COMPANY, et al., |) | |
| |) | |
| Plaintiffs, |) | |
| |) | Civil Action No. 05-11150-DPW |
| vs. |) | Hon. Judge Douglas P. Woodlock |
| |) | |
| ABBOTT LABORATORIES, |) | |
| |) | |
| Defendant. |) | |
| |) | |

**STIPULATION AND PROPOSED ORDER REGARDING BRIEFING ON
DEFENDANT'S MOTION FOR PROTECTIVE ORDER REGARDING DEPOSITION
TOPICS 1 AND 2 OF HANCOCK'S RULE 30(b)(6) DEPOSITION NOTICE**

This stipulation is entered into by and between plaintiffs John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Manulife Insurance Company (f/k/a Investors Partner Life Insurance Company) (collectively "Hancock") and defendant Abbott Laboratories ("Abbott"), by and through their respective counsel of record, as follows:

WHEREAS, Abbott intends to file a Motion for Protective Order regarding Deposition Topics 1 and 2 of Hancock's Notice of Deposition of Abbott Laboratories, served March 30, 2007 ("Hancock's Rule 30(b)(6) Deposition Notice") and the parties have met and conferred regarding a briefing schedule for the motion;

THEREFORE, IT IS STIPULATED AND AGREED THAT:

Abbott will file, and serve via e-mail, its Motion for Protective Order Regarding Deposition Topics 1 and 2 of Hancock's Rule 30(b)(6) Deposition Notice on or before May 7, 2007;

Hancock will file, and serve via e-mail, its Opposition to Abbott's Motion for Protective

Order Regarding Deposition Topics 1 and 2 of Hancock's Rule 30(b)(6) Deposition Notice on or before May 14, 2007;

Abbott will file, and serve via e-mail, its Reply in support of its Motion for Protective Order Regarding Deposition Topics 1 and 2 of Hancock's Rule 30(b)(6) Deposition Notice on or before May 18, 2007.

ABBOTT LABORATORIES

JOHN HANCOCK LIFE INSURANCE
COMPANY, JOHN HANCOCK VARIABLE
LIFE INSURANCE COMPANY and
MANULIFE INSURANCE COMPANY

By its attorneys,

/s/ Michael S. D'Orsi
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Dated: May 1, 2007

SO ORDERED this _____ day of _____, 2007

United States District Court Judge

CERTIFICATE OF SERVICE

I, Michael S. D'Orsi, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on May 2, 2007.

/s/ Michael S. D'Orsi

Dated: May 2, 2007